REMARKS

Claims 23-31, 33-45 and 47-91 and 93-100 are pending in the application and stand rejected under 35 U.S.C. 103 as being unpatenable over U.S. Patent No. 6,269,336 to Ladd. Applicants submit that at the very least, claims 23, 39 and 80 are patentable and non-obvious over Ladd on the grounds that Ladd does not disclose or suggest a conversational browser or method for processing a CML docuemnt and rendering its conversational dialog in one or more of a plurality of user interface modalities, as essentially claimed in claims 23, 39 and 80.

In particular, with regard to claim 23, Ladd does not disclose or suggest a *conversational browser* having a CML processor for parsing and interpreting one of a CML file and CML application, *wherein CML comprises meta-information implementing a conversational dialog to enable interaction with the user in a plurality of user interface modalities including a GUI (graphic user interface) modality and speech modality,* to render the conversational dialog in one or more of the plurality of user interface modalities.

With regard to claim 39, Ladd does not disclose or suggest, for example, *a content server comprising one of content pages, applications, and a combination thereof, wherein the content pages and applications are implemented using a conversational markup language (CML) to describe a conversational dialog for interaction with a user in a plurality of user interface modalities including a GUI (graphic user interface) modality and speech modality.*

With regard to claim 80, Ladd does not disclose or suggest, for example, *generating a request based on the processed input command to access a CML (conversational markup language) file from a content server, the CML file comprising meta-information to implement a conversational dialog in a plurality of user interface modalities including a GUI (graphic user*

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interface) modality and speech modality.

In the Response to Arguments (page 9) of the Final Action, the Examiner contends that Ladd discloses the claimed conversational browser based on the following. First, Examiner cites Col. 3, lines 40-46 of Ladd as allowing a user to acces information in the form of machine readable data, audio, speech, etc. It is respectfully submitted, however, that this misses the point. Ladd does not teach in Col. 3, lines 40-46 *parsing and interpreting a CML file or application to render the conversational dialog of such CML file/applocation in one or more of a plurality of user interface modalities.*

Further, the Examiner cites Col. 4, lines 50-58 which states that retrieved information can be output in the form of speech text graphical information. Again, this misses the point. Ladd does not teach in Col. 4, lines 50-58 *parsing and interpreting a CML file or application to render the conversational dialog of such CML file/applocation in one or more of a plurality of user interface modalities.*

Ladd merely teach outputting audio in text form by speech to text synthesis or outputing text as auio via text to speech syntheses. This is not the same as a *conversational markup language (CML) to describe a conversational dialog for interaction with a user in a plurality of user interface modalities including a GUI (graphic user interface) modality and speech modality.*

The Examiner has still not demonstrated where or how Ladd teaches a browser system for processing CML documents *that describe a conversational dialog for interaction with a user in a plurality of user interface modalities including .* In fact, the Examiner once again ignores and fails to address Applicants previous point that Ladd discloses a *voice browser* (250) that can process a speech markup file to provide an *interactive speech/voice application* (see, e.g., Col 11,

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line 45 – Col. 14, line 5). Moreover, Ladd discloses a markup language that enables development of an application for instruction the voice browser to provide a desired user intertive voice service (see, e.g., Col. 15, line 60 – Col. 16, line 4). If the Examiner truly believes that the SpeechMarkup language disclosed by Ladd is the same or similar to the claimed CML documents, the Examiner should address this with a reasonable explanation, rather than resort to irrelevant teachings of Ladd with regard to the claimed inventions. Otherwise the rejections should be withdrawn.

Respectfully submitted,

Frank V. DeRosa
Reg. No. 43,584
Attorney for Applicant(s)

F. Chau & Associates, LLC
130 Woodbury Road
Woodbury, New York 11797
TEL.: (516) 692-8888
FAX: (516) 692-8889

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